

EXHIBIT 2

STATE OF WASHINGTON
PIERCE COUNTY SUPERIOR COURT

DEPARTMENT OF LABOR AND
INDUSTRIES,

Plaintiff,

v.

GEO SECURE SERVICES, LLC,

Defendant.

NO. 24-2-05626-8

DECLARATION OF ELLIOTT
FURST

I, Elliott Furst, declare under the penalty of perjury under the laws of the United States that the following is true and correct.

1. I am over the age of eighteen and am otherwise competent to testify. I make these statements on personal knowledge and belief.
2. I represent the Department of Labor and Industries and am familiar with this matter.
3. I learned that GEO Services, Inc. had filed a motion to quash the Department of Labor and Industries' warrant for GEO's workplace at the Northwest ICE Processing Center.
4. No declaration from United States Immigrations and Customs Enforcement (ICE) was filed with the motion.
5. I communicated with GEO's attorney, Harry Korrell, about the motion to quash; and I requested GEO hold off in seeking to prosecute its motion to quash pending further review by L&I. He agreed.

DECLARATION OF ELLIOTT FURST

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ATTORNEY GENERAL OF WASHINGTON
LABOR & INDUSTRIES DIVISION
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
(206) 464-7740

1 6. An issue has come up with the lack of the docket number, as explained in the
2 Declaration of Eric Smith. I explained the problem to Mr. Korrell. It is my
3 understanding that the clerk believed only a warrant number was needed to file the
4 warrant, and the judicial assistant for the Presiding Judge indicated a docket number
5 was needed.

6 Dated this 29th day of January 2024, in Seattle, WA by

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10 Elliott Furst, WSBA No. 12026
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